UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner.

Case No: IPR2024-00470

U.S. Patent No. 11,121,222

PETITIONER'S MOTION TO SEAL
REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE
PURSUANT TO 37 C.F.R. §§ 42.14 AND 42.54

Pursuant to 37 C.F.R. §§ 42.14 and 42.54 and Paper 27, Petitioner Monolithic Power Systems, Inc. ("Petitioner") respectfully submits this Motion to Seal. Petitioner moves to seal its Reply to Patent Owner's Preliminary Response (filed concurrently with the present Motion) in its entirety. Petitioner has conferred with Patent Owner, and Patent Owner indicated it does not oppose.

I. Good Cause Regarding Sealing the Paper Containing Confidential Information

The Office Trial Practice Guide (TPG) states that "a document or thing will be made publicly available, unless a party files a motion to seal that is then granted by the Board." Office Trial Practice Guide (Nov. 2019) at 19; *see also* 35 U.S.C. §316(a)(7). "The document or thing will be protected on receipt of the motion and remain so, pending the outcome of the decision on motion." *Id.* The TPG states that "protective orders may be issued for good cause by the Board to protect a party from disclosing confidential information." *Id.* at 20 (citing C.F.R. § 42.54). Here, there is good cause for sealing Petitioner's Reply to Patent Owner's Preliminary Response because Petitioner references Exhibits and Papers filed by Patent Owner under seal.

To maintain a complete and understandable file history for public notice purposes, Petitioner also provides a public version that redacts the confidential information.

II. Protective Order

Patent Owner concurrently requests entry of a modified protective order. Upon entry of that modified protective order, Petitioner designates Petitioner's Reply to Patent Owner's Preliminary Response as "PROTECTIVE ORDER MATERIAL." The Reply for which Petitioner seeks to restrict access references Exhibits and Papers filed by Patent Owner under seal and should only be accessible to persons that qualify under Paragraph 4 of the amended Protective Order.

Dated: September 25, 2024

Respectfully submitted,

/Brianna Kadjo/

Back-up Counsel
Brianna Kadjo, Reg. No. 74,307

Lead Counsel
Miguel Bombach, Reg. No. 68,636

Back-up Counsel
Bing Ai, Reg. No. 43,312
John D. Esterhay, Reg. No. 73,512
John P. Schnurer, Reg. No. 52,196
Runkun (Justin) Jiang, Reg. No. 78,118

Attorneys for Petitioner

PERKINS COIE LLP
11452 El Camino Real, Ste 300
San Diego, California 92130-2080
858.720.5700 (phone)
858.720.5799 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2024, a true and correct copy of the foregoing MOTION TO SEAL was served by electronic mail on the Patent Owner via its attorneys of record:

Alan Whitehurst; Nicholas T. Matich; Arvind Jairam;
Stuart McCommas; Archis "Neil" Ozarkar
Greenthread-Monolithic-MS@mckoolsmith.com

Respectfully submitted,

Date: September 25, 2024

/Anita Chou/
Anita Chou
Paralegal